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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

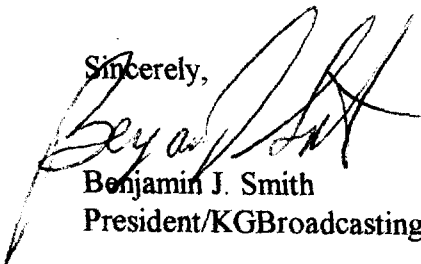
Ms. Leslie Shapiro
Allocations
Federal Communications Commission
Washington, DC 20554

Dear Ms. Shapiro;

Submitted herewith are one original and five copies of a "petition for rulemaking" for an upgrade from Class A to Class B1 for WKGB-FM Susquehanna, PA.

Thank you very much for your help in this matter.

Sincerely,


Benjamin J. Smith
President/KGBroadcasting Inc.

5/13/97

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of:

Amendment of Section 73.202(b)
Table of Assignments for
FM Broadcast Stations
Susquehanna, Pennsylvania and
Walton, New York

To: The Commission:

PETITION FOR RULEMAKING

KG Broadcasting, Inc., (hereinafter 'Petitioner'),
pursuant to Section 1.401 of the Commission's Rules,
respectfully requests a rulemaking proceeding to upgrade
the current License of WKGB-FM, Susquehanna, PA from its
current allotment of Channel 223A to Channel 223B1. For
this upgrade to be technically feasible, the License of
station WDLA-FM, Walton, NY will need to be modified from
its current allotment of Channel 221A to Channel 248A.

| <u>Community</u> | <u>Channel #'s</u> | |
|---------------------------|--------------------|-----------------|
| | <u>Present</u> | <u>Proposed</u> |
| Susquehanna, Pennsylvania | 223A | 223B1 |
| Walton, New York | 221A | 248A |

Included in this petition are two sections. Section 1 is the actual Petition to upgrade station WKGB-FM from Channel 223A to Channel 223B1. Section 2 is a Petition to re-allot station WDLA-FM from its current Channel 221A (currently a grandfathered, shortspaced 3 kw at 100 m or equivalent Class A FM operating under 47 CFR 73.213(c)(1)) to Channel 248A (which would allow WDLA-FM to upgrade to 6 kw at 100 m or equivalent at its current antenna location with a non-directional antenna).

SECTION 1

WKGB-FM B1 UPGRADE

1. WKGB-FM, Susquehanna, PA currently operates as the only commercial broadcast station in Susquehanna County, PA. Although WKGB-FM does provide 60 dBu service to the two largest communities in Susquehanna, PA (Susquehanna and Montrose, PA) a very large area of this county is outside of the 60 dBu service area of WKGB-FM. These areas do not

receive any local commercial radio service from within Susquehanna County, PA and must rely on the Binghamton, NY and Scranton, PA regional services for any commercial radio service. These stations do little programming targeting the needs of these residents. By allowing the upgrade to WKGB-FM to Class B1, these residents would receive their first local radio service (from within Susquehanna County, PA). Exhibit 1 is an allocations study showing that with the exception of WDLA-FM, WKGB-FM could upgrade from Class A to Class B1 on its current Channel 223 (92.5 MHz) and still conform to the Commission's mileage separation requirements (73.207(b)(1) of the Commission's rules).

2. It should be noted that the current WKGB-FM transmitter location would need to be modified to allow for this upgrade. If channel 223B1 is substituted for Channel 223A at Susquehanna, PA, WKGB-FM would expeditiously file a construction permit application that would specify a new antenna location that would conform to the Commission's rules regarding antenna locations and allow for Class B1 operation at Susquehanna, PA. The reference coordinates for WKGB-FM at Channel 223B1 are 41-56-05 N. Lat. and

75-32-00 W. Long. These reference coordinates are very close to the WKGB-FM Community of License, Susquehanna, PA (within 8 km), thus easily providing the required 70 dBu coverage that is required of WKGB-FM to Susquehanna, PA.

SECTION 2

WDLA-FM CHANNEL CHANGE AND 6KW UPGRADE

1. WDLA-FM, Walton, NY currently operates as a grandfathered, short-spaced, 3 kw at 100 m or equivalent Class A FM operating under 47 CFR 73.213(c)(1). WDLA-FM is the only FM allotment allocated to Walton, NY. WDLA-FM cannot upgrade to 6 kw at 100 m or equivalent on its current Channel 221A at its current transmitter location and continue omnidirectional operation. Channel 248A (97.5 MHz) can be allocated to replace Channel 221A at Walton, NY and could specify operation at 6 kw at 100 m or equivalent at the current WDLA-FM transmitter site with a non-directional antenna. The coordinates of the current WDLA-FM site are 42-08-10 N. Lat. and 75-04-48 W. Long. Exhibit 2 is an allocations study showing the feasibility of this channel change for WDLA-FM. This proposal would

allow WDLA-FM to greatly increase its service area and continue operation at its current transmitter location.

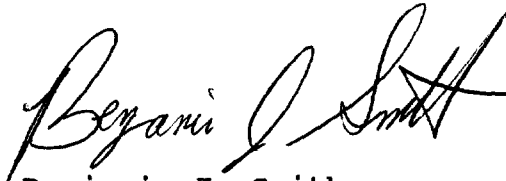
2. As required by Commission policy, KG Broadcasting, Inc., Licensee of WKGB-FM, Susquehanna, PA hereby states its willingness to reimburse Delaware County Broadcasting Corporation, the Licensee of WDLA-FM, Walton, NY, for costs related to this proposed channel change. These costs would include purchase and installation of a new antenna system, modification and reinstallation of the current WDLA-FM transmitter and exciter, and modification of the WDLA-FM isocoupler. These modifications would allow for this channel change to occur at the current WDLA-FM antenna site.

3. It should be noted that KG Broadcasting, Inc. has contacted Delaware Valley Broadcasting Corp. about this proposed channel change and Delaware Valley has indicated its willingness to go along with this proposal as it would receive an upgrade to WDLA-FM. Delaware Valley Broadcasting Corp. has indicated that it will file favorable Comments to this proposal within the required Comment period.

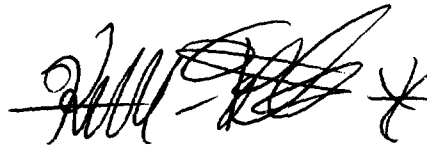
CONCLUSION

This proposal would greatly benefit the public interest as WKGB-FM would effectuate a Class B1 upgrade and WDLA-FM would effectuate a non-directional 6 kw at 100 m or equivalent upgrade at its current site. Both of these stations serve rather large rural areas that do not receive substantial radio service at this time, these upgrades would allow both WKGB-FM and WDLA-FM to increase their service areas greatly. Additionally, WKGB-FM has stated its willingness to reimburse WDLA-FM for the expenses of this channel change, thus removing any major objections that WDLA-FM might have regarding this proposal. In conclusion, KG Broadcasting, Inc. requests this rulemaking procedure to upgrade these stations which would result in a great benefit to the public interest without any negative impacts on any other facilities.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Benjamin J. Smith".

Benjamin J. Smith
President, KG Broadcasting, Inc.
776 Conklin Road
Binghamton, NY 13903
607-723-2925

A handwritten signature in cursive script, appearing to read "Kevin M. Fitzgerald".

Kevin M. Fitzgerald
Technical Consultant
P.O. Box 1223
Wilkes-Barre, PA 18703
717-963-5946

Dated

5/13/97

Petition for Rulemaking
KG Broadcasting, Inc.
Substitute Channel 223B1
for Channel 223A
FM Table of Assignments
WKGB-FM, Susquehanna, PA

EXHIBIT 1

EXHIBIT 1

MAPFM search of channel 223B1 (92.5 MHz), at N. 41 56 5, W. 75 32 0.

Searching Channel 223B1 (92.5 MHz):

| CALL | CITY | ST | CHN | CL | S | DIST | SEPN | BRNG | CLEARANCE | |
|--------|---------------|----|-----|----|---|-------|-------|-------|-----------|----|
| WNTI | Hackettstown | NJ | 220 | B1 | L | 132.2 | 50.0 | 155.4 | 82.2 | |
| WRVN | Utica | NY | 220 | A | L | 131.8 | 48.0 | 10.8 | 83.8 | |
| WCKR | Hornell | NY | 221 | A | L | 178.9 | 48.0 | 284.7 | 130.9 | |
| WDLAFM | Walton | NY | 221 | A | L | 43.7 | 48.0 | 59.2 | -4.3 | * |
| WRNQ | Poughkeepsie | NY | 221 | A | L | 145.2 | 48.0 | 101.4 | 97.2 | |
| WSENFM | Baldwinsville | NY | 221 | B1 | L | 153.3 | 50.0 | 334.4 | 103.3 | |
| WQFM | Nanticoke | PA | 221 | A | L | 88.2 | 48.0 | 198.9 | 40.2 | |
| WFLY | Troy | NY | 222 | B | L | 148.7 | 145.0 | 58.3 | 3.7 | |
| WXRK | New York | NY | 222 | B | L | 184.7 | 145.0 | 135.5 | 39.7 | |
| WLGL | Riverside | PA | 222 | A | L | 146.6 | 96.0 | 222.3 | 50.6 | |
| WWYZ | Waterbury | CT | 223 | B | L | 227.4 | 211.0 | 100.5 | 16.4 | |
| WBEEFM | Rochester | NY | 223 | B | L | 211.0 | 211.0 | 310.8 | 0.0 | |
| WJUNFM | Mexico | PA | 223 | A | L | 224.4 | 143.0 | 223.8 | 81.4 | |
| WKGBFM | Susquehanna | PA | 223 | A | L | 19.2 | 143.0 | 313.2 | -123.8 | ** |
| WXTU | Philadelphia | PA | 223 | B | L | 212.0 | 211.0 | 173.2 | 1.0 | |
| WDREFM | Garden City | NY | 224 | A | L | 200.7 | 96.0 | 130.7 | 104.7 | |
| WENYFM | Elmira | NY | 224 | A | L | 104.2 | 96.0 | 275.9 | 8.2 | |
| WRRV | Middletown | NY | 224 | A | L | 105.5 | 96.0 | 120.3 | 9.5 | |
| WXUR | Herkimer | NY | 224 | A | L | 132.1 | 96.0 | 18.3 | 36.1 | |
| WHTF | Starview | PA | 224 | A | L | 232.4 | 96.0 | 207.3 | 136.4 | |
| ALC | Saugerties | NY | 225 | A | V | 128.4 | 48.0 | 85.9 | 80.4 | |
| WMGS | Wilkes-Barre | PA | 225 | B | L | 88.2 | 71.0 | 198.8 | 17.2 | |
| WPATFM | Paterson | NJ | 226 | B | L | 186.1 | 71.0 | 136.9 | 115.1 | |
| WNTQ | Syracuse | NY | 226 | B | L | 119.5 | 71.0 | 340.2 | 48.5 | |
| WZOZ | Oneonta | NY | 276 | A | L | 66.2 | 12.0 | 34.7 | 54.2 | |
| WQEQ | Freeland | PA | 276 | A | L | 106.5 | 12.0 | 197.1 | 94.5 | |
| ALC | Vestal | NY | 277 | B1 | V | 38.0 | 14.0 | 281.0 | 24.0 | |
| WMXW | Vestal | NY | 277 | A | L | 36.6 | 12.0 | 291.6 | 24.6 | |

* - Station to Change Channel to Channel 248A per this Petition for Rulemaking.

** - To be deleted per this Petition for Rulemaking

Petition for Rulemaking
KG Broadcasting, Inc.
Substitute Channel 223B1
for Channel 223A
FM Table of Assignments
WKGB-FM, Susquehanna, PA

EXHIBIT 2

EXHIBIT 2

MAPFM search of channel 248A6 (97.5 MHz), at N. 42 8 10, W. 75 4 48.

Searching Channel 248A6 (97.5 MHz), from the site of WDLA-FM:

| CALL | CITY | ST | CHN | CL | S | DIST | SEPN | BRNG | CLEARANCE | |
|--------|---------------|----|-----|----|---|-------|-------|-------|-----------|---|
| WDSP | Arlington | NY | 245 | A | L | 101.1 | 31.0 | 117.1 | 70.1 | |
| WOUR | Utica | NY | 245 | B | L | 112.5 | 69.0 | 355.9 | 43.5 | |
| WMKB | Ridgebury | PA | 245 | A | L | 142.9 | 31.0 | 260.7 | 111.9 | |
| WQHT | New York | NY | 246 | B | L | 179.2 | 69.0 | 149.3 | 110.2 | |
| WBHT | Mountain Top | PA | 246 | A | L | 124.8 | 31.0 | 211.9 | 93.8 | |
| WZBG | Litchfield | CT | 247 | A | C | 163.1 | 72.0 | 103.1 | 91.1 | |
| WMYY | Schoharie | NY | 247 | A | L | 86.6 | 72.0 | 50.6 | 14.6 | |
| WYXL | Ithaca | NY | 247 | B | L | 112.7 | 113.0 | 288.9 | -0.3 | * |
| WZAD | Wurtsboro | NY | 247 | A | L | 73.7 | 72.0 | 143.7 | 1.7 | |
| WRVV | Harrisburg | PA | 247 | B | L | 249.1 | 113.0 | 217.0 | 136.1 | |
| WPST | Trenton | NJ | 248 | B | L | 212.8 | 178.0 | 172.9 | 34.8 | |
| WALKFM | Patchogue | NY | 248 | B | L | 223.1 | 178.0 | 130.0 | 45.1 | |
| WFRYFM | Watertown | NY | 248 | C1 | L | 211.6 | 200.0 | 342.9 | 11.6 | |
| WNGN | Hoosick Falls | NY | 248 | A | C | 154.4 | 115.0 | 62.3 | 39.4 | |
| WNGN | Hoosick Falls | NY | 248 | A | L | 172.0 | 115.0 | 62.0 | 57.0 | |
| WKVE | St. Marys | PA | 248 | B | L | 314.4 | 178.0 | 259.5 | 136.4 | |
| W249AE | Oneonta | NY | 249 | D | L | 31.9 | 0.0 | 359.1 | 31.9 | |
| W249AS | Norwich | NY | 249 | D | L | 52.5 | 0.0 | 320.7 | 52.5 | |
| WBKK | Amsterdam | NY | 249 | A | L | 119.8 | 72.0 | 38.1 | 47.8 | |
| WCZX | Hyde Park | NY | 249 | A | L | 101.1 | 72.0 | 117.2 | 29.1 | |
| WGMM | Big Flats | NY | 249 | A | L | 161.8 | 72.0 | 271.0 | 89.8 | |
| WWWD | Jersey Shore | PA | 249 | A | L | 209.3 | 72.0 | 240.9 | 137.3 | |
| WOWZ | Whitesboro | NY | 250 | A | L | 104.5 | 31.0 | 343.4 | 73.5 | |
| WQMR | Jewett | NY | 250 | A | C | 70.3 | 31.0 | 71.5 | 39.3 | |
| WSKQFM | New York | NY | 250 | B | L | 179.2 | 69.0 | 149.3 | 110.2 | |
| WZMT | Hazleton | PA | 250 | B | L | 137.7 | 69.0 | 211.7 | 68.7 | |
| WKZEFM | Salisbury | CT | 251 | A | L | 127.1 | 31.0 | 100.9 | 96.1 | |
| WHWK | Binghamton | NY | 251 | B | L | 72.6 | 69.0 | 263.3 | 3.6 | |

* - Station is fully spaced when rounding to the nearest kilometer.



P.O. Box 192 ESS, Binghamton, NY 13904 · 607-723-2925 · FAX 607-723-5268

Certificate of Service

I, Benjamin J. Smith hereby certify that I have sent the preceding "petition for rulemaking" prepaid first class U.S. mail to:

Mr. Amos Finch
WDLA
Box 58
Walton, NY 13856

Sincerely,

A handwritten signature in black ink, appearing to read "Benjamin J. Smith". The signature is written over the printed name and title.

Benjamin J. Smith
President/KGBroadcasting Inc.
Susquehanna, PA
(607) 723-2925